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A Limited Liability Partnership
Including Professional Corporations
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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

PLUM HEALTHCARE GROUP, LLC, a California corporation; GI PLUM HOLDCO, LLC, a Delaware limited liability company; and QUINCE HOLDINGS, LLC dba PUEBLO SPRINGS REHABILITATION CENTER.

Case No. 15 CV 02747-W-MDD

The Hon. Thomas J. Whelan

**JOINT MOTION TO DISMISS WITH
PREJUDICE**

**NO ORAL ARGUMENT UNLESS
REQUESTED BY THE COURT**

[Complaint Filed: December 8, 2015]

ONEBEACON PROFESSIONAL
INSURANCE, a Bermuda corporation;
HOMELAND INSURANCE
COMPANY OF NEW YORK, a
Minnesota corporation;
and DOES 1 through 30.

Defendants

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Plum
2 Healthcare Group, LLC, GI Plum Holdco, LLC, and Quince Holdings, LLC dba
3 Pueblo Springs Rehabilitation Center (“Plaintiffs”) and Defendants OneBeacon
4 Professional Insurance and Homeland Insurance Company of New York
5 (“Defendants”), hereby jointly move to dismiss Plaintiffs’ complaint against
6 Defendants in the above-captioned action with prejudice. All parties will bear their
7 own costs and attorneys’ fees.

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9 Dated: January 18, 2018 THE HUVER LAW FIRM

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By: *s/ Richard A. Huver*
12 RICHARD A. HUVER

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Attorney for Plaintiffs
Plum Healthcare Group, LLC, GI Plum Holdco,
LLC, and Quince Holdings, LLC dba Pueblo
Springs Rehabilitation Center

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Dated: January 19, 2018 SHEPPARD, MULLIN, RICHTER & HAMPTON
19 LLP

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By: *s/ R. Randal Crispin*
22 R. RANDAL CRISPEN

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Attorneys for Defendants
OneBeacon Professional Insurance and
Homeland Insurance Company of New York